

SEPA Nonproject Review Form

Burnt Hill Recreational Trail Plan

As of September 23, 2005

The State Environmental Policy Act (SEPA), chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. The Nonproject Review Form (NPRF) is an optional tool to help the lead agency evaluate the environmental consequences of a nonproject proposal and to provide information to decision-makers and the public.

The NPRF cannot be used as a substitute for the environmental checklist, but may be attached as supplemental analysis. Applicable information in the NPRF can be referenced in the environmental checklist without having to repeat the information.

The NPRF is intended to be used concurrently with the development of a nonproject proposal. To achieve maximum effectiveness and efficiency the initial use of the form should begin at the time a nonproject proposal is being contemplated, i.e. upon identification that a plan, policy or rule is likely to be needed or is mandated.

The information and analysis in the NPRF should be updated as the proposal is developed. The number of revisions will depend on the complexity of the proposal. If the proposal is minor, one iteration of the NPRF may be sufficient. For more complex proposals, the NPRF should be revised, as analysis is completed or key issues resolved.

If you are unfamiliar with the form, you should review all of the questions before providing any answers. This will help familiarize you with the questions and should avoid duplication of information. Please note that when a nonproject proposal is first contemplated, it is often premature to respond to some questions in the NPRF. Answers may also change as the proposal is developed and analysis is completed.

NONPROJECT REVIEW FORM

FINAL DRAFT

DATE: September 22, 2005

COMPLETED BY: Susan Trettevik and Janet Kearsley, Olympic Region, DNR

PART I - FRAMEWORK

1) Background

a) Name of proposal, if any, and brief description.

Burnt Hill Recreational Trail Plan.

DNR is developing a plan for managing public use of trails on a 5,100-acre block of state trust lands, southwest of Sequim, Washington, known as "Burnt Hill". The trust lands are managed as commercial forestland. However, consistent with state multiple use law, DNR allows recreational use of these lands.

Approximately 520 acres of private forestland are within or adjacent to the state lands in this planning area. The planning area is surrounded by federal forestland, rural land, and expanding urban lands.

Historical Background: Historically approximately 47 miles of logging roads and undesignated trails located on Burnt Hill have been used informally as recreational trails by hikers, horseback riders, mountain bikers, motorcyclists, jeeps and other 4-wheel drive vehicles, quads and others. Undesignated trails are those DNR has not designated for recreational use and therefore does not maintain. In this case, recreation visitors without prior approval built the trails. Over time, this informal use without maintenance has resulted in environmental damage. Based on discussions with the Burnt Hill Focus Group, there have also been some conflicts among recreation visitors in relationship to the 4 wheel driver's past damage of the wetland and meadow areas, and between recreation visitors and neighbors in regards to the noise issues from ORVs using the trails.

One option was to close Burnt Hill to recreational use. This option, however, received strong objection at a public meeting of approximately 250 people. DNR chose, instead, to open a planning dialogue with neighbors and recreation visitors in 1999. The DNR applied for an Interagency Committee for Outdoor Recreation (IAC) grant for the Inventory and Assessment of recreational use on Burnt Hill and the associated impacts. The results of that assessment would be used to develop a recreational strategy. A public meeting was held in October 1999 to initiate the inventory and assessment planning process. As an outcome of this meeting, DNR created a Focus Group to work with the department on the inventory and assessment.

DNR's goal was to arrive at a plan that allowed the same range of uses (motorized and non-motorized), but to ensure trails were located in areas that could sustain that use AND that, when maintained to appropriate trail standards, would not continue to create environmental

damage. The trail strategy would include restoration of areas already damaged, and adopt-a-trail agreements to ensure future maintenance of trails kept open.

In 2002, DNR applied to IAC for an ORV NOVA planning grant to continue working on a trail plan for Burnt Hill. This planning grant was titled the Burnt Hill ORV Trail Plan. It provided significant funding for the planning that is now underway, and ORV trail use is a key component of the planning DNR is currently funded to do. This grant has a timeline for completion, which is shown later in this document. *[See Question 1. d for the grant timeline, page 4-5]* A non-motorized component is also included in the trail plan. That work is being supported by DNR staff time charged to department recreation program budgets and volunteers contributing non-grant hours. Throughout this planning process, DNR has continued to work with the Focus Group, and intends to develop adopt-a-trail agreements between recreation groups and the DNR.

This second planning phase started in earnest in 2004, and is the focus of this non-project review form. As the grant funding for this planning is nearing its end, DNR is working with the Focus Group to finish the Burnt Hill Recreational Trail Plan, which includes the grant-funded ORV trail plan. The preliminary draft of the Burnt Hill Recreational Trail Plan was presented to the Focus group at their Thursday May 5, 2005 meeting. DNR's proposal will be distributed to the public through DNR's State Environmental Protection Act (SEPA) Center for public comment before any final plan is adopted. A standard SEPA checklist and the final draft version of this non-project review form will accompany the draft trail plan. *[See Question 1.d for the planning timeline, page 4-5]*

One element required up front by DNR is commitments by recreation groups to sign Adopt-a-Trail Agreements for all sections of trail (roads/trails) in the trail plan. Also required will be involvement in trail restoration projects as directed by the DNR. These are essential elements for protecting the natural resources from environmental impacts. *[See Question 8 regarding environmental impact issues identified to date, pages 20-30.]*

Since the initial public meetings in 1999 and 2001, many new neighbors have moved into the area as well as new individuals coming to use the area for recreation. They were not involved in the initial development of this planning project. They have many questions and concerns. This optional SEPA form is being used to help communicate the need for a formal trail plan, the potential impacts and issues that have been identified to date, the options being considered so far as solutions, the decisions that need to be made during planning, and the process being used for development and decision-making.

b) *Agency and contact name, address, telephone, fax, email*

Olympic Region, Department of Natural Resources

Contact #1: Wayne Fitzwater, Land Manager (recreation)

Olympic Region, DNR

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wayne.fitzwater@wadnr.gov

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Asset Management and Protection Division, DNR

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c) *Designated responsible official*

Charlie Cortelyou, Region Manager

Olympic Region, DNR

411 Tillicum Lane, Forks, WA 98331

d) *Describe the planning process schedule/timeline*

Past events significant to this current process:

1998	DNR applied to the Inter-Agency for Outdoor Recreation (IAC) for grant money to conduct an inventory and assessment of public use on Burnt Hill.
Oct. 27, 1999	Public Meeting – seeking information about existing public uses of these lands and for discussion about how to find appropriate balance among recreational visitors.
Nov. 1999	Focus Group formed. <i>[See Attachment 1 for list of members, page 35.]</i>
Nov. 1999	DNR contracted with Peninsula College to conduct a recreational use survey for the Burnt Hill block. Survey completed Jan-June 2000.
Dec 1999	First meeting of the Focus Group; thereafter, held monthly meetings and conducted fieldtrips. Brainstormed list of 62 issues to consider in inventory and assessment then distilled these into ten categories.
Feb. 7, 2001	Carrie Blake Park – Open House for public to review list of recommendations drafted by the Burnt Hill Focus Group for DNR to

	consider in the future management of the area. [<i>See Attachment 2 for recommendations displayed, page 36.</i>]
Spring 2001	Selected roads which accessed wetland areas damaged by 4x4 activities including portions of the 100, 200, 201, 201a 201b, 201c, 201d, 203 a, 203 b, 203 c, 204, 205, 207, 211, 302, 304. Closed roads to motorized vehicles, and posted signs closing undesignated trails that previously accessed wetland areas to motorized vehicle.
June 16, 2001	Focus Group, DNR and WDFW mobilized work group to conduct wetlands restoration and seed areas for elk forage, rather than wait until inventory and assessment project was complete.
Oct 2001	Five local residents completed Forest Watch training and signed up as Forest Watch volunteers.
April 2002	Focus Group members agreed on a basic synthesis product regarding environmental sensitivities and how these would affect trail use and locations. [<i>See Attachment 3 (map), page 37.</i>] Key elements include: ¼-mile noise and visual buffer (might widen in some areas as noise data is collected) from the project area boundary, elk travel corridor to and from elk calving areas on the west side of Burnt Hill; potential traffic patterns and how these relate to neighborhoods and county road capacity; protection of two wetland areas in the southern portion of the planning area; river, riparian, and unstable slope areas that would be avoided if any new trail construction occurred.
April 11, 2002	Members of user groups represented on the Burnt Hill Focus Group presented their perceptions and their preferences regarding trails they would like to use to the DNR Commissioner of Public Lands-Doug Sutherland. Meeting open to the public.
Nov. 2002	DNR submitted planning grant application to IAC.
Spring 2003	DNR received IAC grant for Burnt Hill ORV trail planning.
Nov. 2003	Elk forage project grant submitted to Rocky Mt. Elk Foundation by Wash. Dept. of Fish & Wildlife representative on Focus Group, partnering with DNR on grant.
May 6, 2004	Burnt Hill Focus Group meetings resumed. Draft “trail adoption criteria” reviewed. [<i>See Attachment 4, page 38.</i>]
Oct 20, 2004	DNR representatives attended an open meeting held at Carrie Blake Park to hear private residential neighbor’s concerns about the planning project.
October 2004	DNR submitted application to IAC for an Education & Enforcement (E&E) grant, requesting funds for two 8-month trail/campground warden’s (augmented by state trust land funds to two 9-month positions). The North Olympic Peninsula would be first priority for the wardens’ attention.

Dec. 2004	DNR issued a DNS and SEPA checklist for an interim multiple use trail project (approximately 2,490 feet of old road grade and 1,220 feet of new trail construction) that would help protect the two wetland areas of concern; primarily by giving motorcyclists a built-to-standard, maintained connection between east and west side of the hill that did not enter the wetlands. This connection may or may not be a part of the final strategy proposal, but was felt to be important for meeting environmental protection needs in the present.
Nov '04- Jan '05	Focus Group members began putting lines on a map, creating draft idea(s) for a Recreational Trails Plan for Burnt Hill; taking into consideration 1) user preferences, 2) neighbor issues, 3) environmental sensitivities, and 4) adopt-a-trail resources.
Feb 1, 2005	DNR submitted a preliminary draft plan to IAC as an interim report to show progress on planning grant.
Feb 17, 2005	Olympic Region Manager and staff met with Alliance for Recreation and Conservation (ARC) Board in Sequim; this is a new organization representing some of the local Burnt Hill neighbors and others. The meeting focused primarily on unsafe shooting issues, but also touched on motorized recreation and other concerns ARC has about Burnt Hill.
Feb 28, 2005	DNR requests grant extension from IAC. Moves internal timeline out to September 2005 for plan completion.
March 3, 2005	DNR continues to work with the Focus Group to review potential issues and complete the draft proposal. Parking issues a primary focus in March. Collected information regarding areas currently used and the number of vehicles visually observed.
April 1, 2005	DNR notified that the IAC Board funded the Olympic Region's Education & Enforcement grant proposal. Began immediate hiring of two 9-month trail/campground wardens.
April 29, 2005	The revised second preliminary draft of the Burnt Hill Recreational Trail Plan is provided to the Focus Group members for review.
May 5, 2005	Burnt Hill focus group meeting to review and comment on the preliminary draft of the Burnt Hill Recreational Trail Plan.
May 16-17 2005	DNR hired two Education and Enforcement wardens for the Olympic Region, with IAC grant funds.
June 29, 2005	Olympic Region Manager and staff met with Alliance for Recreation and Conservation (ARC) Board in Sequim to explain the main strategies developed so far in the working draft Burnt Hill Recreational Trail Plan.
July/Aug 2005	DNR continues to develop ideas and options for the Recreational Trail Plan, compiling a draft document for SEPA review.

Future Timeline Elements

- | | |
|---------------|---|
| October 2005 | DNR posts and mails SEPA documents. A 30 –day SEPA review period starts. All formal comments directed to DNR SEPA center.

Public Open House to provide information that helps the public comment effectively about the draft plan. (Not a public hearing for taking comments.) |
| November 2005 | Thirty (30) day SEPA review period ends.

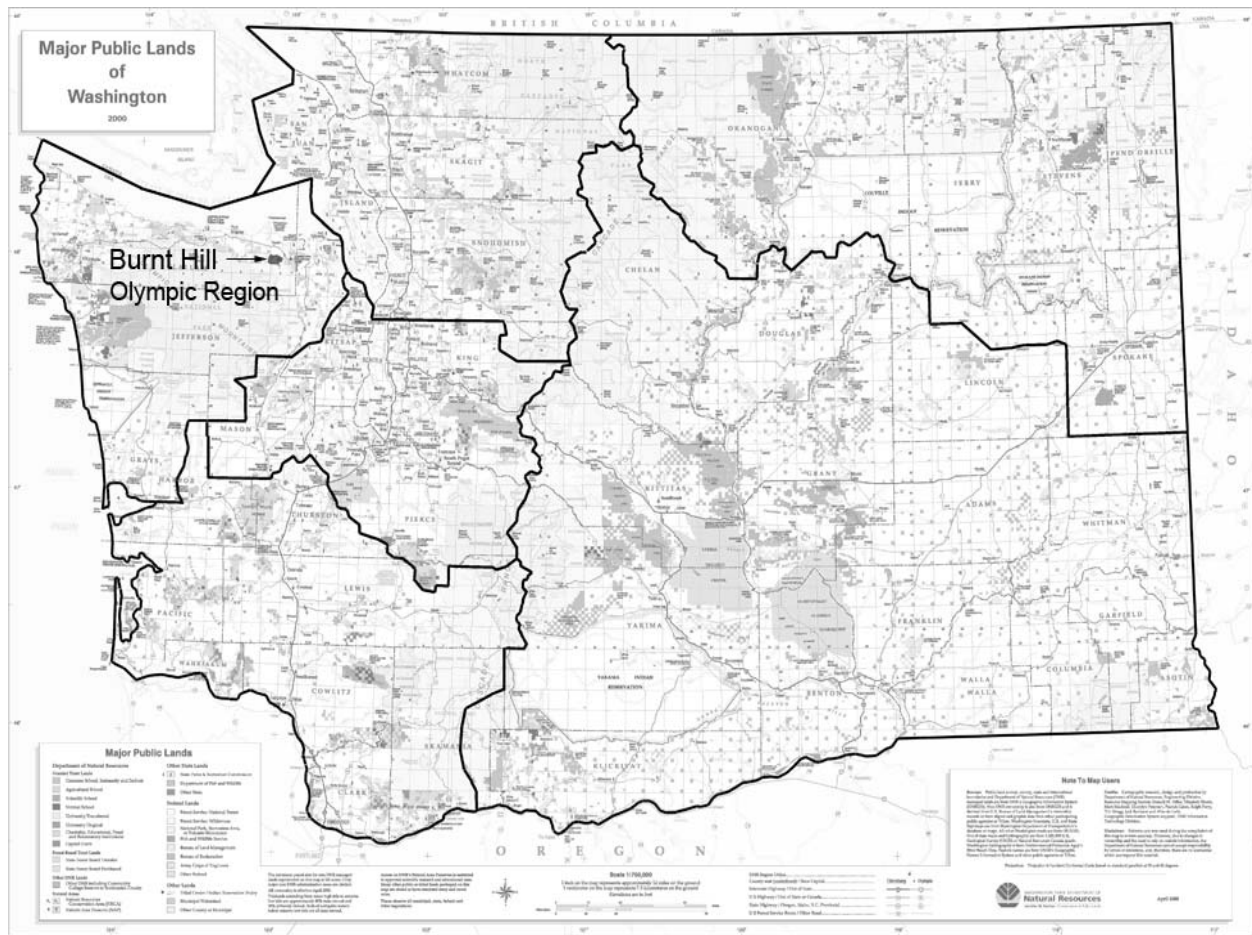
SEPA Response Summary completed.

Complete any revisions to the plan based on SEPA input |
| December 2005 | Final declaration issued by SEPA responsible official. |
| January 2006 | DNR adopts a final Recreational Trails Plan for the Burnt Hill block of state trust forestlands.

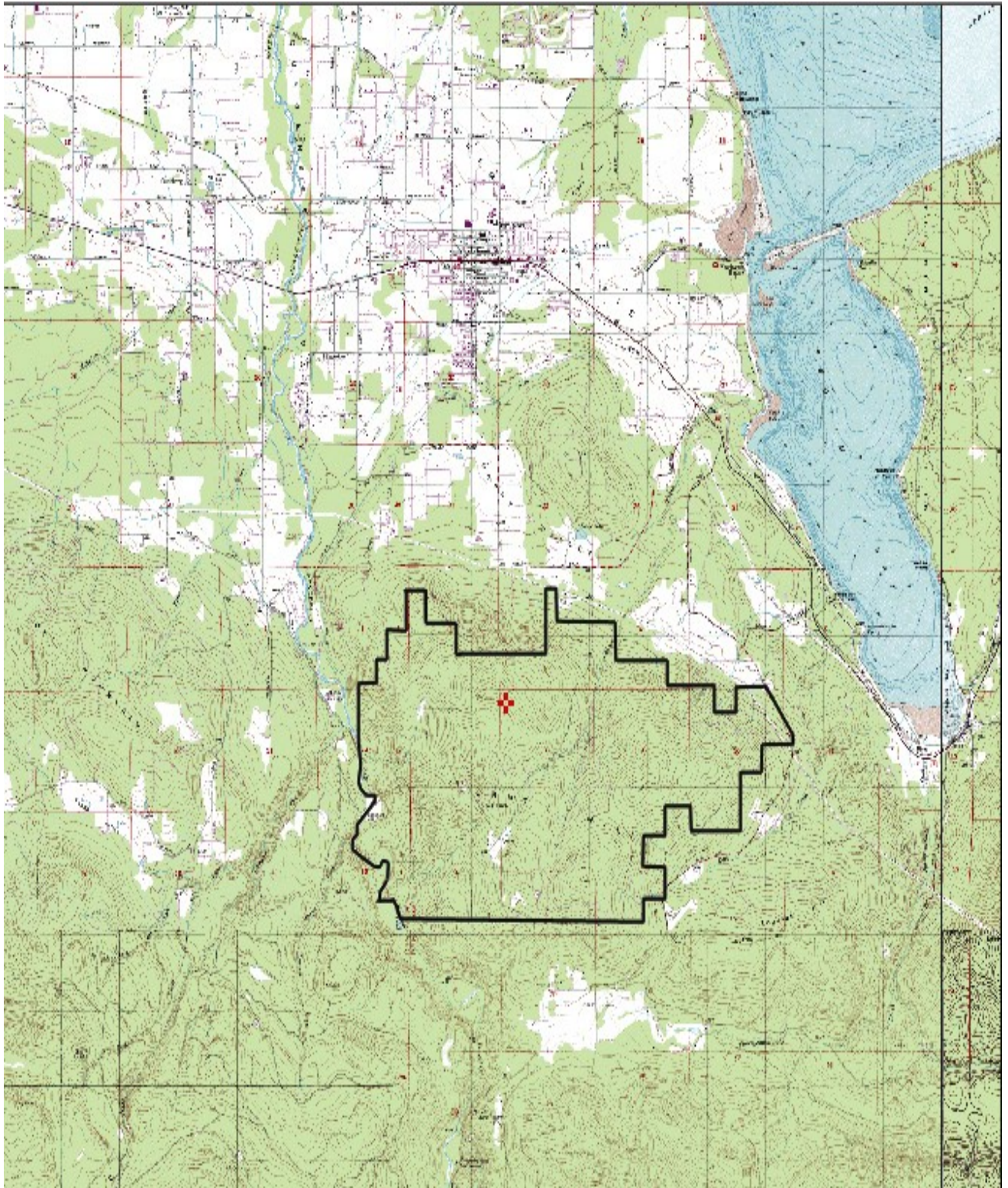
Implementation begins. |

e) *Location - Describe the jurisdiction or area where the proposal is applicable.*

DNR-managed state trust lands within Clallam County, zoned as commercial forestland.



Map One: Vicinity Map



MAP TWO: Planning Area Boundary Map

f) What is the legal authority for the proposal?

Several Revised Code of Washington (RCW) citations and Washington Administrative Code (WAC) citations are provided below, some with language excerpts included, to help the reader evaluate this non-project proposal within the legal context around state trust land management and public use.

- **Title 79 RCW Public Lands**
- **RCW 79.10.100**
Concept to be utilized, when.

The legislature hereby directs that a multiple use concept be utilized by the department in the administration of public lands where such a concept is in the best interests of the state and the general welfare of the citizens thereof, and is consistent with the applicable provisions of the various lands involved.

- **RCW 79.10.120**
Multiple uses compatible with financial obligations of trust management -- Other uses permitted, when.

Multiple uses additional to and compatible with those basic activities necessary to fulfill the financial obligations of trust management may include but are not limited to:

- (1) Recreational areas;
- (2) Recreational trails for both vehicular and non-vehicular uses;
- (3) Special educational or scientific studies;
- (4) Experimental programs by the various public agencies;
- (5) Special events;
- (6) Hunting and fishing and other sports activities;
- (7) Non-consumptive wildlife activities as defined by the board of natural resources;
- (8) Maintenance of scenic areas;
- (9) Maintenance of historical sites;
- (10) Municipal or other public watershed protection;
- (11) Greenbelt areas;
- (12) Public rights of way;
- (13) Other uses or activities by public agencies;

If such additional uses are not compatible with the financial obligations in the management of trust land they may be permitted only if there is compensation from such uses satisfying the financial obligations.

- **RCW 79.10.200**
Multiple use land resource allocation plan -- Adoption -- Factors considered.

The department may adopt a multiple use land resource allocation plan for all or portions of the lands under its jurisdiction providing for the identification and establishment of areas of land uses and identifying those uses which are best suited to achieve the purposes of RCW 79.10.060, 79.10.070, 79.10.100 through

79.10.120, 79.10.130, 79.10.200 through 79.10.330, 79.44.003, and 79.90.456. Such plans shall take into consideration the various ecological conditions, elevations, soils, natural features, vegetative cover, climate, geographical location, values, public use potential, accessibility, economic uses, recreational potentials, local and regional land use plans or zones, local, regional, state, and federal comprehensive land use plans or studies, and all other factors necessary to achieve the purposes of RCW 79.10.060, 79.10.070, 79.10.100 through 79.10.120, 79.10.130, 79.10.200 through 79.10.330, 79.44.003, and 79.90.456.

- **WAC 332-52 Use of Managed Lands and Roads (recreational access)**
- **RCW 4.24.210 Liability of owners or others in possession of land and water areas for injuries to recreation visitors-- Limitation.**

(1) Except as otherwise provided in subsection (3) or (4) of this section, any public or private landowners or others in lawful possession and control of any lands whether designated resource, rural, or urban, or water areas or channels and lands adjacent to such areas or channels, who allow members of the public to use them for the purposes of outdoor recreation, which term includes, but is not limited to, the cutting, gathering, and removing of firewood by private persons for their personal use without purchasing the firewood from the landowner, hunting, fishing, camping, picnicking, swimming, hiking, bicycling, skateboarding or other non-motorized wheel-based activities, hang gliding, paragliding, rock climbing, the riding of horses or other animals, clam digging, pleasure driving of off-road vehicles, snowmobiles, and other vehicles, boating, nature study, winter or water sports, viewing or enjoying historical, archaeological, scenic, or scientific sites, without charging a fee of any kind therefore, shall not be liable for unintentional injuries to such recreation visitors. *[Underlining added. Included here since some ask why a strategy on state trust lands is unlikely to included a user fee.]*

- **Chapter 79A.25 RCW Interagency Committee For Outdoor Recreation**
Chapter 79A.25.005 Policy – Mission of Committee. *Excerpt:* It is therefore the policy of the state and its agencies to preserve, conserve, and enhance recreational resources and open space. In carrying out this policy, the mission of the interagency committee for outdoor recreation and its staff is to (a) create and work actively for the implementation of a unified statewide strategy for meeting the recreational needs of Washington's citizens, (b) represent and promote the interests of the state on recreational issues in concert with other state and local agencies and the governor, (c) encourage and provide interagency and regional coordination, and interaction between public and private organizations, (d) administer recreational grant-in-aid programs and provide technical assistance, and (e) serve as a repository for information, studies, research, and other data relating to recreation. *[This language is included here to clarify the role IAC plays for the state legislature relative to funding recreational activities, a question that came up relative to using IAC NOVA-account money for this planning work.]*

- **RCW 79A.35.070**

- Categories of trails or areas -- Policy statement as to certain state lands.**

- The following seven categories of trails or areas are hereby established for purposes of this chapter:

(3) Scenic-access trails which give access to quality recreation, scenic, historic or cultural areas of statewide or national significance;

(6) ORV vehicle trails which are suitable for use by both four-wheel drive vehicles and two-wheel vehicles. Such trails may be included as a part of the trail systems enumerated in subsections (1), (2), (3) and (5) of this section or may be separately designated;

(7) Off-road and off-trail areas which are suitable for use by both four-wheel drive vehicles and two-wheel vehicles. IAC shall coordinate an inventory and classification of such areas giving consideration to the type of use such areas will receive from persons operating four-wheel drive vehicles and two-wheel vehicles.

The planning and designation of trails shall take into account and give due regard to the interests of federal agencies, state agencies and bodies, counties, municipalities, private landowners and individuals, and interested recreation organizations. It is not required that the above categories be used to designate specific trails, but the IAC will assure that full consideration is given to including trails from all categories within the system. As it relates to all classes of trails and to all types of trail users, it is herein declared as state policy to increase recreational trail access to and within state and federally owned lands and private lands where access may be obtained. It is the intent of the legislature that public recreation facilities be developed as fully as possible to provide greater recreation opportunities for the citizens of the state. The purpose of chapter 153, Laws of 1972 ex. sess. is to increase the availability of trails and areas for off-road vehicles by granting authority to state and local governments to maintain a system of ORV trails and areas, and to fund the program to provide for such development. State lands should be used as fully as possible for all public recreation, which is compatible with the income-producing requirements of the various trusts.

- g) ***Identify any other future nonproject actions believed necessary to achieve the objectives of this action.***

Establishing a highly visible, effective, Education & Enforcement (E&E) program in Olympic Region. Application was made to the Interagency for Outdoor Recreation (IAC) for an E&E grant for FY 2006 to supplement region-operating funds. The grant was received and two wardens hired for May 2005 –Jan 2006. A second grant request was submitted that would allow the region to provide this same coverage again from April-December 2006.

2) Need and Objectives

- a) *Describe the need for the action. (Whenever possible this should identify the broad or fundamental problem or opportunity that is to be addressed, rather than a legislative or other directive.)*

Need: The DNR recreation program recognized the impacts from trails that were poorly located by recreation visitors. Some of the trails were built through environmentally sensitive wetlands causing damage to these systems. A number of the trails were built on grades that are too steep for sustained use. The trails that were built had no organized or regular maintenance program. As a result, many are not in optimal condition.

DNR recognized growing pressures and concerns regarding recreational use on Burnt Hill. The use is primarily active road and trail use, as well as passive hiking and driving to vistas. There is also abuse of state land, such as garbage dumping and vandalism, as well as impacts to the forest environment from braided trails, etc. It was strongly requested in an early public meeting that the department maintain the range of recreational uses occurring on Burnt Hill at the time this process was started. However, the current grant only funds planning for ORV use. Yet, it is DNR's intention to do this ORV planning in such a way that the concerns of other user types are addressed to the degree possible through a combination of grant funding and Olympic Region's regular operating funds.

If the department is to maintain the range of recreational uses occurring on Burnt Hill in the 1990's when this project was started, as strongly requested at an early public meeting, then a pro-active Trails Plan is needed for Burnt Hill to protect the environment, reduce disturbances to the neighbors, and reduce abuse to the trust lands/assets. This need is consistent with the Multiple Use Act. The Burnt Hill planning work was initiated with the general understanding that DNR would support the recreational uses occurring in 1998 (motorized and non-motorized), if the Burnt Hill Focus Group could recommend a workable strategy regarding the location of specific trails and ensure associated adopt-a-trail agreements.

Purpose: The purpose of this particular planning effort is to develop a recreational trail plan for Burnt Hill that protects trust assets, protects the environment, reduces disturbances to neighbors, as well as addresses other limited issues to relevant to recreational use on Burnt Hill.

- b) *Describe the objective(s) of the proposal, including any secondary objectives that may be used to shape or choose among alternatives.*

Objectives directly linked to recreational trail use that have been identified during public meetings, by a formal survey, by input from DNR staff and the Burnt Hill Focus Group members, and through the formal inventory and assessment, include:

- Avoiding disturbance of elk calving areas¹;

¹ Northern spotted owls and marbled murrelet habitat were not found to be an issue for existing trails. Potential habitat sensitivity was evaluated relative to DNR's HCP conservation strategies and requirements for these two species.

- Maintaining some level of safe, compatible use by motorcycles, hikers, mountain bike riders, horseback riders, 4x4s, and by neighbors enjoying scenic views;
- Bringing trail locations/conditions up to appropriate standards (for those trails that are retained as part of the designated trail system);
- Ensuring ongoing maintenance to minimize erosion and hydrologic impacts;
- Protecting trust assets;
- Avoiding any more user-built trails, without advance approval from DNR and using DNR trail design standards, including trails from private neighbor's lands;
- Protecting river, riparian and unstable slopes in any areas where trail relocation may be considered;
- Reducing trespass from state land to adjacent private lands by recreational visitors;
- Avoid noise pollution (e.g., motorcycles and 4x4s) above established Dept. of Health levels RCW 46.09.120 (e). Noise levels set by law 86 decibels on the "A" scale at 50 feet or 105 decibels on the "A" scale at a distance of 20 feet.
- Formally directing vehicles to designated parking areas to help avoid traffic issues and/or trespass onto private lands;
- Providing signage that provides clear and direct information;

Other issues that have been identified and need to be addressed by DNR in conjunction with this planning, but are not solely linked to recreation plan trail system, include:

- Reduce garbage dumping.
- Reduce vandalism.
- Curtail unsafe recreational shooting (e.g., target shooting)
- Protect against wildfire

c) ***Identify any assumptions or constraints, including legal mandates, which limit the approach or strategy to be taken in pursuing the objective(s).***

Multiple Use Act - DNR interprets this law as direction to seek acceptable ways to allow a full range of recreational use whenever it can; while types of use may be limited, it must be due to impacts that can be identified and documented.

Trust Land – DNR is obligated to manage these state trust lands in a manner that generates income to the trust beneficiaries (with equal consideration for present and future citizens), that protects and/or enhances the trust value, and that protects the environment consistent with state and federal law.

Initial planning commitments -DNR is working on a recreational trail Plan for Burnt Hill. A key component of this plan is the ORV trail plan funded by a grant from IAC to DNR. However, the overall trail plan will address the interests of all recreation visitors. This is possible due to the many hours of volunteer labor from the Focus Group members (which are not a match within the planning grant), and non-ORV program dollars allotted to the Region.

DNR made a commitment to the neighbors and the Focus Group members that it would try to arrive at a trail plan that supported all the recreational uses on Burnt Hill in 1999 at a public meeting (including motorized use). As a result, DNR is bringing forward a trail plan for SEPA review that supports the current range of recreational use. However, DNR's commitment does not restrict the final decision on a trail plan, and SEPA comments may influence that decision.

Authority relative to shooting – The primary authority relative to establishing no-shooting areas rests with the Clallam County Commissioners and with the Washington State Department of Fish & Wildlife (hunting). RCW 43.30.310 gives DNR ability to enforce laws and rules pertaining to public use of state lands. Current rules directly related to shooting address-discharging firearms in a campground and individuals shooting posted signs within the department's jurisdiction (in WAC 332-52). RCW 9A also relates to potential penalty for specific incidents related to shooting. Since DNR does not have sole jurisdiction over decisions to manage shooting, DNR will not address shooting per se in the Burnt Hill Recreation Trail Plan.

d) If there is no legislative or other mandate that requires a particular approach, describe what approaches could reasonably achieve the objective(s). Not applicable.

3) Environmental Overview

Describe in broad terms how achieving the objective(s) would direct or encourage physical changes to the environment. Include the type and degree of likely changes such as the likely changes in development and/or infrastructure, or changes to how an area will be managed.

- Trails currently in poor condition (e.g., rutting; too steep; etc.) would be brought to best-practices trail standards and maintained on a regular basis; thus reducing damage (e.g., erosion, water run-off, etc.). This would include trail bed and surfacing materials, trail design across and on slopes, and trail bridges and other types of water crossings.
- Controls over where trails are located would reduce potential disturbance of elk cows at calving time, reduce damage to wetland areas, reduce potential water quality impacts at water crossings, and reduce potential riparian habitat impacts.
- Reducing the number of new undesignated trails, especially those built without advance approval, would also reduce the likelihood of impacts to water quality, hydrology, and wildlife.
- Controls on trail locations should also reduce the likelihood of noise and visual pollution for neighbors.
- Managing the area as day-use-only should help protect health and safety, reducing the occurrence of illegal garbage dumping, unsafe shooting at night, vandalism, unattended campfires, etc.
- A designated parking area, with regulatory notices and posting of rules and educational materials, along with improved signing and visible education and enforcement wardens, should promote appropriate and safe trail use, and reduce off trail travel and associated impacts.

² "Trail" here can be either a footpath, a motorcycle path, a old roadbed, or an existing road.

4) Regulatory Framework

a) *Describe the existing regulatory/planning framework as it may influence or direct the proposal.*

- The Multiple Use Act requires DNR to try and allow a range of recreational uses on the land if they do not interfere with trust land management activities, and the environment is appropriately protected;
- The Inter-agency for Outdoor Recreation (IAC) grant money from ORV fund involves a commitment by DNR to a Burnt Hill ORV trail plan;
- DNR made a commitment to the public and the Burnt Hill Focus Group that the department would try and accommodate all the recreational uses occurring on Burnt Hill in 1998;

b) *Identify any potential impacts from the proposal that have been previously designated as acceptable under the Growth Management Act (GMA), chapter 36.70A RCW.*

Chapter 31.01 Clallam County Comprehensive Plan

31.01.200 Growth management goals

(9) Open Space and Recreation. Encourage the retention of open space and development of recreational opportunities, conserve fish and wildlife habitat, and increase access to natural resource lands and water and develop parks.

31.02.320 Environment and open space goals

(14) Open Space and Public Access.

1. [Policy No. 38] Public access sites and public open spaces should provide for non-motorized recreation and for transportation trails for citizens of all levels of ability. Educational and interpretive activities are a desirable component of public spaces, especially where water resources are present.
2. [Policy No. 39] Motorized transportation and recreation trails are an appropriate use of public open space, provided that motorized vehicle use can be managed to prevent pollution impacts from erosion, fuels, exhaust and noise. Motorized activities should be compatible with existing recreational uses of the site and surrounding area but not negatively impact recognized significant plant and animal communities.

Chapter 31.03 Sequim-Dungeness Regional Plan

31.03.195 Open space and the environment-Conservation policies

(3) Recreation. [Policy No. 3] Identify and provide for increased recreational and public access opportunities to natural resource lands and water where appropriate and complementary to the natural and cultural characteristics of the area.

- d) Existing managed public access to public forest lands for recreation should be maintained.

5) Related Documentation

- a) *Briefly describe any existing regulation, policy or plan that is expected to be replaced or amended as a result of the proposal. (Adequate descriptions in section 4.a may be referenced here, rather than repeated.)* None
- b) *List any environmental documents (SEPA or NEPA) that have been prepared for items listed in 4.a. or that provide analysis relevant to this proposal. Note: Impacts with previous adequate analysis need not be re-analyzed, but should be adopted or incorporated by reference into the NPRF.*

Identify the:

- i) Type of document: **Burnt Hill By-pass Trail SEPA**
- ii) Lead agency and issue date

**Washington State Department of Natural Resource,
The Determination of Non-significance (DNS) was signed on Dec. 3, 2004.
The SEPA notice was issued Dec. 9, 2004. (SEPA Log #04-120903)
Comment period closed at 4:30 pm December 23.
The notice of final determination (as DNS) was signed Jan. 14, 2005.**

- iii) Where copies can be viewed or obtained

Washington State Department of Natural Resource SEPA Center

- iv) The portions of the document applicable to the current proposal and briefly explain relevancy. Summarize the relevant impact assessment or, provide reference to discussion(s) in Part II that includes this information.

The By-pass trail will become a portion of the overall trail system being planned for Burnt Hill. Early action was taken on this section of the trail as an interim measure to protect a wetland in private ownership that was being impacted by undesignated trail use by Off Road Vehicles that was being accessed via DNR land. A bridge will be constructed at a trail crossing on a fork of Johnson Creek.

- i) Type of document: **NEPA and EA for Caraco Creek Elk Forage Areas**
- ii) Lead agency and issue date: **United States Forest Service, 1998**
- iii) Where copies can be viewed or obtained: **United States Forest Service, Quilcene USFS office, Quilcene WA**
- iv) The portions of the document applicable to the current proposal and briefly explain relevancy. Summarize the relevant impact assessment or, provide reference to discussion(s) in Part II that includes this information. **The Caraco Elk Forage Area is located near the Burnt Hill Recreation Area southwest boundary. No trails currently exist in that segment of the planning area. DNR has worked with the USFS, WSDFW and the Dungeness Elk Working team to identify and plant elk forage areas in the Burnt Hill Recreation Area.**

a) ***List other relevant environmental documents/studies/models, which have been identified as necessary to support decision making for this proposal.***

1. Burnt Hill Block Recreational Use Survey Report. June 2000
Conducted by Peninsula College, Port Angeles, WA. Commissioned by the Washington State Department of Natural Resources, Olympia, WA.
Where information may be viewed or obtained: DNR Forks Headquarters, Forks WA.
2. Neighbor comment sheets gathered at open meeting, October 2004, and submitted to DNR. Where information may be viewed or obtained: DNR Forks Headquarters, Forks WA.
3. Assessment and inventory work information collected by Kevin Burke under a contract funded by the IAC grant. Where information may be viewed or obtained: DNR Forks Headquarters, Forks WA.
4. Basic land data contained within DNR's geographic information system (GIS), including soils, streams, topography, forest cover, northern spotted owl and marbled murrelet habitat. Where information may be viewed or obtained: WA Dept. of Natural Resources, Asset Management and Protection Division, Olympia, WA

6) Public Involvement (Optional)

a) ***Identify agencies with jurisdiction or expertise, affected tribes, and other known stakeholder groups whose input is likely to be specifically solicited in the development of this proposal.***

Neighbors to state trust land: Alliance for Recreation and Conservation (ARC); Focus Group neighbor representatives; Merrill & Ring Timber Company; U.S. Forest Service. Also, a mailing list of individual neighbors is being assembled for this and future SEPA documents distribution. Public meetings and open houses also included neighbors in the past. Also:

User groups: Backcountry Horsemen, Washington 4-Wheel Drive Association, Olympic Trailblazers, Mud Toys, Just Jeep Junkies, Olympic Peninsula Bicyclists, Peninsula Trails Coalition; local hikers Olympic Peninsula Motorcycle Club

Other organizations: Audubon Society; Washington Environmental Council, Rocky Mountain Elk Foundation; Dungeness Elk Management Team Olympic Forest Coalition; North Olympic Action Committee

Tribes: Jamestown S'Klallam Tribe

State Agencies: Department of Ecology; Department of Fish & Wildlife; Interagency for Outdoor Recreation;

County & Local Government: Clallam County Commissioners; Clallam County Noxious Weed Board; Clallam County Planning Department; Clallam County Sheriff's Office; City of Sequim

b) *Briefly describe the processes used or expected to be used for soliciting input from those listed. [Examples: ad hoc committees, tribal consultations, interagency meetings, public workshops or hearings, newsletters, etc.]*

- SEPA notifications by mail, and postings on DNR's SEPA website.
- Focus Group members communication with their group's members.
- Open Houses and public meetings.
- Meeting(s) with Clallam County Planning Department regarding traffic issues.
- Meetings with the ARC Board.
- Informal contacts with interested parties around specific issues.

PART II – IMPACT ANALYSIS AND ALTERNATIVES

7) Affected Environment

Generally describe the existing environmental landscapes or elements (e.g., character and quality of ecosystem, existing trends, infrastructure, service levels, etc.) likely to be affected if the proposal is implemented. Include a description of the existing built and natural environment where future “on the ground” activities would occur that would be influenced by the nonproject proposal.

***Note:** When complete, this section needs to provide information on existing conditions for the elements of the environment discussed in sections 8 and 9. A list of both the built and the natural elements of the environment is found in WAC 197-11-444, and included at the end of this form.*

Affected Environment

Topography and Earth: Burnt Hill sets in the lower foothills of the Olympic Mountains south of the city of Sequim, east of the Dungeness River and south and west of the head of Sequim Bay. Elevation ranges from 800 feet to approximately 2400 feet. Burnt Hill is composed of two knobs separated by a topographic saddle. There are eight different soil types in the Burnt Hill planning area [(13)Clallam; (21)Elwha, (22)Elwha; (34)Louella; (36)Louella grvly loam; (44)Nielton; (59-61) Shonorbush; (76)Yearly] In their current phase most of the soil types are stable. The two identified as unstable [(44)Nielton; (59-61) Shonorbush] are all located on steep slopes that do not have existing trails or any proposed trails in these areas.

Surface Water and Wetlands: The project planning area is located in three Watershed Assessment Unit's, Dungeness Valley, Bell Creek and Sequim Valley. There are numerous small streams that flow from the Burnt Hill landscape. There are several unnamed streams that flow west into the Dungeness River of which the receiving body of water is the Dungeness Bay. To the south and east sides of the hill unnamed streams flow into Dean Creek and then into Sequim Bay near the Jamestown S'Klallam Tribe's

land. The Johnson Creek headwater to the north has several tributaries that flow into Sequim Bay at the John Wayne Marina. There are seven wetlands in the vicinity. Protection of four of these wetlands was addressed in the planning process. The other three wetlands are located on private property. Recreational use on those lands is not managed by DNR and not included in DNR's recreational trail plan for Burnt Hill. Through adopt-a-trail agreements, signage and Education & Enforcement trail wardens will restrict access.

Plants: The plant communities exist of mixed communities of deciduous and conifer trees and their associated undergrowth vegetation. Tree species within the planning area include Douglas fir, Western hemlock, Grand fir, Red cedar, Big leaf maple, Red alder, and Madrona and their associate undergrowth huckleberry, salal, Oregon grape, Ocean spray and Pacific rhododendron. Through time several wild fires have burned through this area in a regular cycle, some of which may have originated in the Sequim prairie. This fire activity in addition to early logging has left only scattered remnants of old growth trees.

Animals: The Burnt Hill area provides habitat for a diversity of mammal and bird species associated with mountain forests. An estimated 160 species of terrestrial animals are presumed to utilize the planning area during a portion of the year. Mammal species include elk, deer, bear, and cougar. Known bird species include hawks, eagles, Spotted owl, Marbled murrelet, Harlequin ducks and songbirds. Roosevelt elk, Marbled murrelet, Harlequin duck and Spotted owls are species of concern that use the existing wildlife habitat in that area. Through analysis it was determined that due to stream gradients and downstream fish blockages, no fish species live in the tributaries located in the planning area.

Historical and Cultural Environment: Historically this area was the site of many small homesteads scattered across the landscape. One of these homesteads was even used for raising pigs as a source of income and food. For a period of time the area now owned by Merrill and Ring Timber Company was also the site of many motorcycle races.

Transportation/Noise: Noise from ORV use of the site was identified as an issue prior to the development of the trail planning process. Rural development from the town of Sequim has expanded to the immediate vicinity of the Burnt Hill Recreation Area. There are currently 555 residents living adjacent to the planning area, and 12 active building permits. Using the 10-trips/day average, it is estimated that the traffic for the adjacent residential roads is 39,690 trips per week. Traffic counts into the existing non-designated trail system average of 30-40 trips per week (just under 0.10% of the overall traffic for the area). Nighttime activity in the Burnt Hill area is responsible for occasional increases in this percentage up to <2% but these spikes in traffic are not consistent or predictable or believed to be associated with recreational use of the area.

Air quality: Vehicle and ORVs using the site contribute a small amount of air pollution from the vehicle exhaust and dust generated by trail riding. Small trail work projects and the By-pass trail have resulted in only minor sporadic increases in emissions from vehicles used to access the site and chainsaws used for trail work.

Public Services: Fire and police protection are important services to Burnt Hill relative to current recreation activities. General education and enforcement is a need on Burnt

Hill. The designation of the Burnt Hill Recreational Trail site as an official Department of Natural Resources (DNR) managed recreational area would provide a stronger framework for DNR education and enforcement making it more effective.

Recreation: In the late 1990's the DNR looked at the amount of recreational use taking place on Burnt Hill. At that time there were approximately 47 miles of road and undesignated trail being used for recreational purposes. This use included ORV, horse, 4x4, hiker, and mountain bikes. Trails construction had occurred in sensitive wetland areas. These were undesignated trails (i.e., user-built and unmanaged by DNR), and have received little to no maintenance after being built. Without a regular maintenance program damage was taking place such as the rutting and erosion of trails, and braided trails. Trespass onto private and federal ownerships was a problem that was also identified. At this time the draft recreational plan calls for the adoption of 11.6 miles of renovated trail and 4.7 miles of new or relocated trail plus a designated parking area. The plan also requires that trails will need to have signed "Adopt-a-Trail" agreements before formal designation. Trails without agreements will be closed and restored. All trail adopted will have to meet DNR trail maintenance standards. Volunteers will be trained in the many aspects of construction and maintenance of multiple-use trails. All work will be coordinated with DNR oversight. All trail construction and timing will be reviewed under the habitat conservation plan currently in place signed by both the DNR and the U.S. Fish and Wildlife Service.

In general, the changes to trails themselves are expected to be improvements (e.g., reconstructing trails to proper standards and implementing routine maintenance, thus reducing erosion and hydrology impacts; or closing a trail and conducting restoration work to solve past impact problems).

8) Key Issue Assessment

List the identified key issues or areas of controversy or concern and include a brief statement of why each is a key issue. For each item listed:

- a) Identify alternative options or solutions for the objective or concern.
- b) Describe the environmental considerations/impacts relevant to each of the alternatives identified in 8.a.
- c) Describe reasonable mitigation of adverse impacts identified.
- d) Identify those alternatives to be carried forward for further analysis.
- e) Briefly describe why those alternatives rejected from further consideration were not carried forward.

NATURAL ENVIRONMENT

Issue 1: Elk calving habitat

Description

The Dungeness Elk Working Team (DEWT) and Washington Department of Fish and Wildlife (WDFW) identified the importance of migration corridors between the Sequim prairie and areas used for forage and calving. Historically these calving areas are located

in both the Caraco and Canyon Creek drainages on the west side on the Dungeness River. The U. S. Forest Service has completed forage enhancement projects in conjunction with DEWT, The Sequim Elk Habitat Committee, and the Rocky Mountain Elk Foundation in the Caraco Creek area. This is hoped to act as an incentive for the herd to continue to use these calving areas.

The DNR has also allowed the creation of several forage areas on Burnt Hill. These areas are generally located on the northern boundary of the ownership block in the Bell View Timber Sale, which was completed in 2004. This cooperative project included the burning of landing areas and scattered slash piles that was followed up with the seeding of native forage species. Additionally selected areas that included abandoned roads, old landings, and other meadow areas were either scarified and planted or just planted to the same forage species mix. These were located centrally in the block and to the south and west.

A Boy Scout volunteer enhancement project was also completed in a naturally occurring meadow area. This project was to prune selected young conifer trees allowing continued growth of forage species. A representative of WDFW is generally supportive of this plan provided that migration corridors are maintained utilizing primarily the riparian areas along the Johnson Creek drainages or in a thoughtful manner that will allow access to forage areas. The riparian areas of Johnson Creek lend themselves to this function as they naturally lead from lower elevations to the wetland/meadow areas at or near the headwaters. The Sequim Elk Habitat Committee, which is made up of concerned citizens does support the overall Burnt Hill plan as currently written. This committee is planning to approach a private landowner within the Burnt Hill landscape with the desired outcome of a purchase to provide additional forage areas. The group hopes for some flexibility to relocate the trails that surround this parcel if needed.

Options Considered:

- A. No trails. Close the #100 trail, which travels east/west actually crossing the Dungeness River at the old Klink bridge site.** This option was not chosen because the current high usage of trails and the volume of recreation visitor built trails indicate that there is a need for the Burnt Hill recreation facility. This would be a very costly undertaking and a difficult to enforce action for the DNR Recreation program. Additionally little support would be provided by the Community for the closure of these trails.
- B. Allow a non-motorized trail on the approximate location of the 100 trail. This would keep the option open of a Foothills Cross County Equestrian Trail corridor to cross Burnt Hill. This trail is referenced in the Clallam County Comprehensive Plan Section 31.02.420 Trails, Paths and Sidewalks Item number 21(d).** This option was not selected because it would require a signed easement with Merrill and Ring (M&R) Timber Company before a trail would be permitted.
- C. Allow limited multiple-use trail access while recognizing the importance of migration and travel corridors across the landscape. This would allow access to areas that have had forage enhancement projects completed and the historical calving areas in the Caraco and Canyon Creek drainages west of the Dungeness River. Provide elk habitat informational signing for trails adjacent to elk travel**

corridors.

Preferred Option

Option C is the preferred option, since it would allow limited multiple-use access while supporting the desired migration and travel corridors along the riparian areas.

Issue 2: Bird Habitat

Description

DNR's review of the TRAX system, a database used to identify threatened, endangered and sensitive species (as well as cultural resources), did not show migratory bird issues, nor were any raised by the Washington State Department of Fish and Wildlife (WDFW). The WDFW representative on the Focus Group did highlight their concerns regarding eagle and other species of concern. DNR also identified the need to analyze spotted owl and marbled murrelet habitat issues under the department's HCP.

At this time approximately nine spotted owl circles cross the Burnt Hill landscape. However there are no nest sites located in the Burnt Hill planning area. Through discussions with the Olympic Region's wildlife biologists it was determined that existing trails (motorized and/or non-motorized) did not, in this case, impact either Marbled murrelets or Spotted owls. Through a review of the proposed trail relocations and trail construction projects, it was determined that very few trees would have to be removed. With careful planning it may be possible not to remove any trees at all. No trees will be removed for the parking lot because it is going to be located in a landing that has been harvested within the last five years.

At this time DNR is completing its Marbled murrelet long-term conservation strategy under the HCP. Any future trail construction will be consistent with this strategy and with the Habitat Conservation Plan signed with the Federal Fish and Wildlife Department.

Issue 3: Riparian areas

Description

The major riparian area in the Burnt Hill area is located along the Dungeness River that lays along the western boundary of this block of trust lands. Several species of threatened fish are listed for the Dungeness. In addition Harlequin Ducks, eagles, and elk use this riparian area as a travel corridor.

The only trail proposed in the Burnt Hill Trail system that will cross a riparian area is the Burnt Hill Bypass Trail. This trail crosses a fork of Johnson Creek that is classified as a Type 5 (seasonal stream, not fish-bearing) at the crossing location. The Burnt Hill Bypass Trail has undergone a previous SEPA review (SEPA Log # 04-120903), and no adverse impacts on the riparian area were identified. The work is also compliant with the department's HCP riparian conservation strategy. The crossing is located at an existing road junction from which the culvert had been removed. Rather than replace the culvert, a bridge will be constructed in the Fall of 2005. At this time no new trails proposed within the Burnt Hill planning area will cross through riparian areas.

Issue 4: Wetlands

Description

There are four wetlands located on DNR managed lands on Burnt Hill. Three additional wetlands are located on private land within the Burnt Hill block. These three wetlands are not addressed in the plan. Two of the wetlands on DNR land have been impacted by recreational use in addition to past homesteading and logging activities.

The wetland in the south central portion of the block was most severely impacted by four-wheel drive activity. DNR, WDFW, DEWT, BHFG, the Pacific Northwest Four-wheel Drive Assoc., and the Rocky Mountain Elk Foundation reviewed this impact. In addition the Clallam County Noxious Weed Coordinator determined the existence of meadow knapweed in the area that is on the mandatory control list. It was decided to undertake a volunteer rehabilitation project. Approximately 70 volunteers worked over three days leveling rutted areas and preparing the soil to receive a forage mix made up native plant species. Local timber companies, assisting with the project donated heavy equipment and operator's time. Upon completion of the project the area was signed closed to motorized use. For the most part this closure has been honored.

The second wetland impacted by motorized use is located on the southeast corner of the Burnt Hill block. The trail listed on the map as the 810 crosses the lower end of the wetland. Under this plan, the #810 trail crossing the wetland will be abandoned. This area has not been as greatly impacted by motorized use as the above-mentioned wetland although there have been cases of ORVs crossing the area. At this time there has been no knapweed located in this area.

The remaining two wetlands are located along the western portion of Burnt Hill in depressions in the landscape before it descends into the Dungeness River. These small areas have been used by the Sequim Elk herd as bedding and forage areas. With WDFW and DNR oversight, a local Boy Scout Troop completed forage enhancement projects in and near these wetlands. Only minimal evidence of undesignated trails exists here, and no designated trails are proposed here.

Options Considered:

Close access to these wetland areas. Observe at a minimum Habitat Conservation Plan requirements for buffer areas. Wetland restoration to mitigate the damages cause by past vehicle use.

Preferred Option

Only one option was considered because of the damage that had already been done to these wetland systems. The DNR considered this a basic resource protection obligation under the HCP. Action has already been taken to close access to the wetland areas. Trails will not be permitted to cross these areas. Wetland restoration activities have taken place in the damaged wetland systems. Restoration work will continue as part of the implementation of the plan.

Issue 5: Fish habitat

Description

There are numerous small streams that flow from the Burnt Hill landscape. There are several streams that flow west into the Dungeness River of which the receiving body of water is Dungeness Bay. To the south and east sides of the hill streams flow into Dean Creek and then into Sequim Bay near the Jamestown S’Klallam Casino. Johnson Creek to the north with several tributaries also flows into Sequim Bay at the John Wayne Marina.

The majority of the streams in the Burnt Hill block are type 4-5 streams (non-fish-bearing). A few streams located at the base of the foothills are Type 3 streams (fish-bearing) that are classified as fish bearing by the established minimum stream size criteria. No trails currently exist or are proposed to be built in that region of the Burnt Hill planning area.

The WSWF is not aware of any fish stocks within the planning area. Stream gradients and downstream fish blockages are factors that contribute the absence of fish in the Burnt Hill planning area.

Issue 6: Surface erosion

Description

Currently all trails located within the Burnt Hill planning area are classified by DNR as undesignated. This designation means that DNR did not sanction the construction of these trails nor were they built to any set trail standards. Additionally there has been little to no regular maintenance projects completed. Currently there are areas of trail that are heavily rutted, braided trails and poorly located trail with overly steep grades. This has lead to many areas that have suffered major surface erosion during periods of heavy rain.

Options Considered:

- A No Change. :** The DNR recreation program recognized the impacts from trails that were poorly located by recreation visitors. A number of the trails were built on grades that are too steep for sustained use by ORVs. The trails that were built have no organized or regular maintenance program. As a result, many are not in optimal condition. To leave them as they are would not be responsible management because additional major surface erosion cause render the trails dangerous to ride. This option doesn’t meet the needs, and objectives of the plan to reduce impacts to unstable slopes and bring the trail up to DNR standards
- B Close all trails.** This option was not chosen because the current high usage of trails and the volume of recreation visitor built trails indicate that there is a need for the Burnt Hill recreation facility. This would be a very costly undertaking and difficult to enforce action for the DNR Recreation program. Additionally little support would be provided by the Community for the closure of these trails.
- C Designate trails using criteria developed by the Focus Group and DNR.** (*See Attachment 4 at the end of this document, p. 38*) Any trail being considered must also have signed adopt-a-trail agreements before it is formally designated. These

agreements would bring each trail up to DNR standards and require best management practices. These practices would require installation of culverts, water control structures, and trail hardening techniques to control surface erosion. In addition sections of trail with overly steep grades would be relocated to help reduce surface erosion.

Preferred Option

Option C is the preferred option because it would provide the best means for reducing surface erosion while still providing a recreational experience in the Burnt Hill area.

BUILT ENVIRONMENT

Issue 8: Noise-motorized vehicles

Description

At the beginning of this planning process there was approximately 47 miles of road and user built trails within the Burnt Hill block that were used for recreation purposes. Recreation included motorized use such as quads, motorcycles, and 4x4 vehicles. Additionally the public uses the roads as access points for recreational target shooting, hunting, horseback riding, mountain biking, berry picking, and sightseeing. All of these uses at some level contribute to noise levels for the surrounding landscape. Some neighbors in the Happy Valley area also felt that the majority of the noise comes from ORVs heading south from an area used for parking at the junction of Easterly and Johnson Creek Roads.

Options Considered

- A No Change.** This was not an acceptable option for the neighbors that are concerned about noise in the Burnt Hill Recreation Area. The DNR did not chose this option because it was determined early in the process that measures could be taken to reduce the noise impacts.
- B Restrict all motorized access.** This option was not chosen because the current high usage of trails and the volume of recreation visitor built trails indicate that there is a need for the Burnt Hill recreation facility. This would be a very costly undertaking and difficult to enforce action for the DNR Recreation program. Additionally little support would be provided by the Community for the closure of these trails.
- C Implement a flexible one-quarter mile buffer to act as a noise buffer within the exterior boundaries of the block.** Restrict access to only the Johnson Creek to help limit the noise issue. Road and trails access on the 101, 200, 608 and 809 would be closed to ORVs. Work with Clallam County to restrict parking at the junction of Easterly and Johnson Creek Road to eliminate the noise of ORVs accelerating south into the Burnt Hill area. Build a single parking area just south of the junction of the PA-J-2000 and the PA-J-2100 roads. Construct a trail to the west from the parking lot moving ORV traffic into a timbered area to further reduce the noise.

Preferred Option:

Option C is the preferred option. This option allows managed motorized use to

occur, while addressing noise issues. When combined with the day-use-only strategy for controlling garbage and illegal activities, night noise would also be reduced. The selection of only one motorized short access road and a centralized parking area would also drastically reduce noise throughout the rest of the Burnt Hill Recreation Facility.

Issue 9: Neighborhood Traffic Flow and Parking

Description

Traffic is a concern to local neighbors. They do not want a destination area that would significantly increase traffic through their neighborhoods or at Highway 101 junctions. DNR and the Focus Group discussed traffic flow (relative to parking, trailheads, and type of recreational use) and potential for traffic increases (relative to trail system design, advertising, signing, etc.).

Trail length and parking capacity

The proposed plan is designed to keep the trails to a length that could be maintained by local recreation visitors. This smaller number of miles should reduce the likelihood that the facility will draw a large increase in number of visitors. In addition, the proposed parking area would emphasize current levels, and not increased capacity. This would require parking management, and enforcement, to be successful.

The Focus Group identified seven locations that have been used as parking sites. Use was not a factor in identifying these locations but just that parking was occurring. These locations included Bell View (uppermost landing area used for the Bell View timber sale), junction of the 400 and 500 roads, Party Spot (large road junction on east side of block), West Knob (end of 400 road), Truck and Trailer (along Palo Alto Road), 1700 Road, Easterly (junction of Easterly and Johnson Creek Roads). The Focus Group estimated that approximately 35 vehicles are parked among these seven sites at any one time. This number was used to help identify suitable site(s).

Other factors considered were the overall location on the landscape, proximity to neighbors, access to existing or proposed trails, possible uses and the suitability of access (example – large horse trailers pulled up long steep road grades), suitability for building/cost, and environmental constraints. There was also a general preference to have only one access point to help with other issues such as garbage dumping.

Recreational trips on trails/Johnson Creek Road

To help understand the amount and timing of current road and trail uses on Burnt Hill, DNR has placed an infrared traffic counter in different locations around Burnt Hill. This includes two sites along the main Johnson Creek Road and in locations on different trail and road segments. Trail traffic counts range from 15 to 20 counts per week. Early numbers from Johnson Creek Road suggest an average of 56 round trips per day. Of that total between 40 percent of the trips occur between 8:00 PM and 8:00 AM. DNR feels that these after-hours “visitors” are likely causing the majority of the garbage dumping and other vandalism problems, rather than being the recreation visitors the system needs to serve.

Recreation traffic relative to residential traffic

Another analysis was done to determine how significantly recreation traffic would alter the traffic demands in the area relative to demands already occurring, and growing, due to

residential housing and other construction in the area. According to the Clallam County Engineering Department the average traffic count per household is estimated to be 10 trips per day. This includes not only trips by the resident but also supporting activities such as delivery of newspaper, mail, meter-reader, etc. There are approximately 555 residences contributing to the Happy Valley and Palo Alto Road systems with an additional 12 active building permits. Using the 10-trips/day figure, it is estimated that the traffic for the adjacent residential roads is 39,690 trips per week. Traffic counts into the existing non-designated trail system average 30-40 trips per week (just under 0.10% of the overall traffic for the area). Nighttime activity in the Burnt Hill area is responsible for occasional increases in this percentage up to <2% but these spikes in traffic are not consistent or predictable or believed to be associated with recreational use of the area.

Advertising

DNR also researched the advertising that Burnt Hill already receives by local chamber(s), trail groups, etc. Considering the advertising that already exists, listing the site on DNR's maps will not increase visitors as dramatically as one would expect if there was no other advertising prior to adoption of the plan.

Options Considered

- A **No Change.** This was not considered a viable option by either the DNR or the Burnt Hill Focus Group because of the traffic concerns of the local neighbors and the current level of undesirable activities occurring.
- B **Restrict all motorized access. Restrict all parking.** This option was not chosen because the current high usage of trails and the volume of recreation visitor built trails indicate that there is a need for the Burnt Hill recreation facility. This option would unduly impact recreational visitors, without making a reasonable attempt to work with the volunteers willing to upgrade and maintain the trails to DNR standards to protect trust assets and prevent environmental damage and keep the area open. Closing motorized access would not only exclude ORV activities, but also those who use Burnt Hill as a place to view the surrounding landscape, pick berries, watch wildlife, etc. Only immediate neighbors with ability to walk in could enjoy Burnt Hill. This would be a very costly undertaking and a difficult to enforce action for the DNR Recreation program. Additionally little support would be provided by the Community for the closure of these trails.
- C. **Promote two access routes, one from Johnson Creek Road and one from Palo Alto Road. Establish a designated parking area for motorized vehicles on the Palo Alto Road side of Burnt Hill near the county road, and a multiple-use parking area off Johnson Creek Road.** Although this was a preferred option for some of the recreation visitor groups, it was not chosen for a number of reasons. The first being the proximity of the second access road to the neighbors. It was not possible to allow motorized access on the Palo Alto Road within infringing on the ¼ noise buffer zone. The second factor eliminating this option, was the increased cost of the additional parking lot construction and long term maintenance of the road. This option would alter the general traffic flow that currently exists, moving more traffic to the Palo Alto side. It would also create two access points, making traffic control and activity monitoring more difficult.

- D** Make the Burnt Hill a day use only area with a gate steward to open and close the gate daily. Focus parking in a designated area off Johnson Creek Road, which is already the primary access route and would make the smallest change to existing traffic flow patterns. Manage parking to support current rather than expanded parking capacity. Provide a trail from the parking lot to designated ORV trails.

Provide public outreach, signage, and enforcement efforts. This type of program is used at areas such as Green Mountain west of Silverdale and in Elbe near Mount Rainier. This would be a way for the public to continue to access the hill but allow some control of undesirable activities.

Preferred Option

Option D is the preferred option. This option would continue to provide the best access to those wishing to recreate in the Burnt Hill area with the least change to existing traffic patterns. It would help control the overall traffic numbers and help reduce illegal activities on Burnt Hill. The Belle View site was considered to be the best parking location - the site is internal to the ownership, a portion of the construction has been completed with the timber sale, it would reduce noise compared to the Easterly Road, did not drastically change traffic patterns, is at the upper limit of what large horse trailers could access, and has good proximity to either existing or proposed trails.

Issue 10: Garbage dumping/Litter

Description

Garbage dumping and the associated impacts both on the state lands management budget and on the environment-is the most mentioned issue associated with the public use on Burnt Hill. With the ever increasing cost of tipping fees at local landfills and transfer stations a portion of the public chooses to save money by dumping trash on forest lands. This problem is not just a Burnt Hill issue but is one faced by all agencies/landowners on the peninsula. Through time the DNR has used a combination of Washington Conservation Corps. Crews, wild land fire crews, recreation maintenance crews, correction center inmate crews, and volunteers to pick up garbage and litter. However, the problem continues to grow, while operating budgets continue to shrink.

Options Considered

- A. No change.** This option was not chosen because it would not meet the objectives or trust requirements to maintain the value of state lands.
- B. Completely close Burnt Hill by locking the most northerly gate and restricting all other accesses.** Closing Burnt Hill is not a viable option because of the current high number of recreation visitor to the area. It would be a costly and difficult option to enforce.
- C Close Burnt Hill to all except recreational visitors by locking the double gates located at the junction of the 400 and 500 roads. Require short wheelbase 4x4 vehicles to navigate a barrier to gain access thus restricting full sized trucks.** This was not considered a viable option. By default it would also restrict families and others who wished to access the hill in passenger vehicles to view the

surrounding landscape, pick berries, watch wildlife, etc

- D Change Burnt Hill to a day-use-only recreational area. Establish a “gate steward” program, with volunteers opening and closing the access gate each day. Provide no parking at the gate, only internal parking accessible when the gate is open. Post hours at the gate. (Hours would be changed at least two times a year relative to daylight hours.)**

Preferred Option

Option D is the preferred option. This option would continue to provide the most access to the public while restricting access during the time frame when most of the dumping problems are believed to be occurring. This would also restrict access to the hill during the time when the teenage parties are occurring. This option would also address issues of concern such as vandalism and unsafe recreational shooting that often occurs in this area after dark. DNR recognizes this option is dependent on establishing a gate steward volunteer program.

Issue 11: View access

Description

The road mainline (400), which accesses the west side of the Johnson Creek drainage, terminates at the top of the west knob of Burnt Hill. There are two viewpoints located along the last 600 feet of the road where a person has a sweeping 360-degree view of the northeast corner of the Olympic Peninsula. The view includes Mt. Baker, the San Juan Islands, and the southern end of Vancouver Island (including Victoria, British Columbia), Port Angeles, Hurricane Ridge, and the upper reaches of the Dungeness River. These views are valued by many as one of the most important reasons to continue to access the Burnt Hill area.

No specific options were developed around view access. However, options for addressing other issues (especially traffic flow/parking, and garbage dumping) were weighted, in part, against their impact on view access. The goal was to try and maintain this access. Parking for recreational trail use will be directed to the designated parking area. View and dispersed recreation pull-off sites will not be eliminated. These areas will not be managed as trailhead or full-day parking, but rather as short stops for viewing the surrounding landscape, berry picking and other disperse recreation activities.

Issue 12- Education and Enforcement

Description

DNR has had limited resources for education and enforcement (E&E) on Burnt Hill. Olympic Region has one Natural Resources Investigator for the entire region, encompassing state trust lands in Clallam and Jefferson counties, and part of Grays Harbor County. The recreation land manager gives a large percentage of his attention to Burnt Hill, relative to other areas along the Straits of Juan de Fuca. At least one volunteer trained through the Forest Watch program continues to be eyes and ears reporting problems to the land manager. Volunteers working with the Focus Group have also provided occasional feedback when they have observed E&E needs.

Nearly all public input, whether in favor of continued open recreational access or preferring that DNR close Burnt Hill to vehicle access, has pushed for greater education and enforcement on Burnt Hill. This presence is needed not only to provide information about the proper use of State Trust lands for recreation, but also for enforcement when improper use is occurring, both to protect trust assets and to protect natural resources and the surrounding area.

In 2004, DNR went to the Interagency Committee for Outdoor Recreation (IAC) and successfully applied for a one year E&E grant. With the restructuring of the Non-highway Off Road Vehicle Account (NOVA) grants, the E&E program can cover both motorized and non-motorized recreation. DNR hired two E&E Trail Wardens whose main emphasis area will be along the Straits of Juan De Fuca.

The wardens have “police powers” training and are able to write citations under all the natural resource Washington Administrative Codes (WACs) and Revised Code of Washington (RCWs). Their schedules include weekends to put them in the field when most of the recreation activity is taking place. At this time it is estimated that approximately 25% of the warden’s time will be spent in the Burnt Hill area. This can vary according to need; it is expected that a higher percentage will be spent up-front educating recreationists to the rules and use of the Burnt Hill area. DNR also seeks to develop a better-coordinated volunteer program and these positions will assist with this.

Options considered

- A Secure a grant to hire a full-time permanent (or 8-month) Education & Enforcement Natural Resources Investigator, with duty emphasis along the northern Olympic Peninsula.** Option B was seriously pursued for a time. DNR’s recreational operating budget could not meet the start up costs for an NRI, along with match requirements, to secure an IAC grant. However, DNR could support the matching requirements for two eight-month trail/campground wardens. In addition, two wardens working together to establish the volunteer and education program in combination with enforcement measures would work well up front, without precluding future efforts to hire a full time E & E NRI, if needed and when budget allows.
- B Secure a grant to hire two 8-month seasonal E&E trail/campground wardens. These positions will be dependent on grants for their continuance each year. Establish strong communication links among the wardens, the NRI, campground hosts, trail and campground maintenance workers, and recreation land manager.**

Option B has already been implemented. Since this decision by DNR was not dependent upon adoption of this trail plan, it was implemented independently. It does relate directly to the viability of the draft Burnt Hill Recreational Trail Plan, however, so is worth the discussion here for reviewer awareness.

9) Proposed Non-project Action or Alternative Actions

Describe a range of reasonable alternatives or the preferred alternative that will meet the objective(s). For each alternative, answer the following questions referring again to the list of the elements of the environment in WAC 197-11-444:

- a) If this alternative were fully implemented (including full build-out development, redevelopment, changes in land use, density of uses, management practices, etc.), describe where and how it would direct or encourage demand on or changes within elements of the human or built environment, as well as the likely affects on the natural environment. Identify where the change or affect or increased demand constitutes a likely adverse impact, and describe any further or additional adverse impacts that are likely to occur as a result of those changes and affects.
- b) Identify potential mitigation measures for the adverse impacts identified in 9.a and describe how effective the mitigation is assumed to be, any adverse impacts that could result from the use of the mitigation, and any conflict or concern related to the proposal objectives and/or key issues identified.
- c) Identify unavoidable impacts and those that will be left to be addressed at the project level.
- d) Describe how the proposal objectives will or will not be met if the impacts described in 9.c were to occur.

***Note:** Alternatives may be rejected at any point in the process if: they have no environmental benefit, are not within existing authority, are determined unfeasible, or do not meet the core objectives.*

Alternative One: Close and decommission all of the trails to all recreation visitors in the Burnt Hill area.

This alternative was rejected because if this alternative were fully implemented, it would simply displace the current recreation visitors from the site. The current recreation visitors of the site would build undesignated trails on other state, federal or private land in the general vicinity. The potential for increased environmental impacts would be greatly increased as recreation visitors dispersed to other open space areas. In addition, it would be counter to the spirit of the Multiple Use Act, without adequate rationale for such.

Alternative Two: Convert all the existing trails into designated trails without any restrictions on use.

This alternative was rejected because if this alternative were fully implemented the potential for increased environmental impacts would be greatly increased if recreation visitors continued to use some of the more sensitive sections of the established undesignated trail system. Trail maintenance is an important component in the protection of the environment. The existing 47 miles of trail would be impossible to maintain to DNR's trail standard with the existing seasonal DNR Maintenance and Operational crew and existing recreation volunteers and current funding sources. The risk of conflict between the different recreational users from the site and the neighboring community would also increase. Finally, it would give the wrong message to recreation visitors – that they can go out and freely build trails and have them simply adopted into DNR's trail system regardless of impacts.

Alternative Three: Accommodate only motorized recreational use on designated trail systems. (4 x 4 Use, and Motorcycle Use Preference)

This alternative was rejected because the Washington Department of Natural Resources made a commitment at the beginning of the planning process to accommodate all current recreation visitors of the Burnt Hill planning area. The preferred trails identified by these two user groups were incorporated in the planning of the designated trail system for the planning area. Additionally several other groups made commitments of time to assist with the recreation trail

planning for this area and these forms of recreation needed to be incorporated into the overall plan. This alternative also does not meet the intent of the Multiple Use Act and does not meet the need and objectives stated in the plan. This alternative could result in the building of unregulated trails by the hikers, trail runners, mountain bikers and Back Country Horseman.

Alternative Four: Accommodate only non-motorized recreational use on designated trail systems. (Neighborhood, Hiker, Mountain Bike and Back Country Horsemen Preference)

This alternative was rejected because the Washington Department of Natural Resources made a commitment at the beginning of the planning process to accommodate all current recreation visitors of the Burnt Hill planning area, if this could be done while protecting trust assets, protecting the environment, and reasonably accommodating issues around noise and traffic. The trails preferred by the representatives of non-motorized recreational visitors is included in the proposed designated trail system. However two (2) segments of this preferred trail system cross private timberlands. Without access easements in place, these segments could not be added to the proposed trail plan. If access easements can be obtained in the future, these two trail segments could be considered in future trail development planning efforts for the Burnt Hill Recreation area.

Alternative Five: Development of a multi-use DNR Designated Trail System

The development of a multi-use trail system was the selected alternative for this plan for numerous reasons.

- The recognized need for additional facilities on the North Olympic Peninsula as demonstrated by the approximately 65 miles of undesignated trails located on trust lands in the Sequim/Port Angeles area outside of Burnt Hill
- The consistency of this alternative with the Multiple Use Act for state lands;
- Willingness by the different recreation visitors groups to sign “Adopt-a-Trail” agreements for maintenance and construction projects
- Willingness of the different recreation visitors groups and other volunteers to assist with the closing and revegetation of poorly located or unnecessary trails
- The potential seen for the Forest Watch and Gate Steward volunteer programs currently proposed or functioning.
- Grant support received to date for Education and Enforcement Trail Wardens who now patrol Burnt Hill and work closely with the Olympic Region’s Natural Resource Investigator and Recreation Land Manager.
- The specific elements designed to channel recreational visitors onto well located, well maintained trails, with controlled parking and with restriction of hours to also help address garbage dumping and other illegal activities.
- Several Revised Code of Washington (RCW) citations and Washington Administrative Code (WAS) citations provided; Title 79 RCW Public Lands, RCW 79.10.100, RCW 79.10.120, RCW 79.10.200, WAC 332-52, RCW 4.24.210 provides DNR with the ability to construct and maintain recreational facilities such as what is proposed by this plan.

a. Anticipated Changes over time

- All trails brought to and maintained at DNR trail standards.
- All designated trails signed.
- All undesignated trails closed and restored.
- Existing recreation-caused damage to wetlands, restored over time.

- Established trailhead and trailhead parking with ADA toilet.
- Parking outside trailhead parking lot limited only to non-motorized activities.
- Day-use only recreation area.

b. Mitigation measures

- The preferred alternative reduces the number of trails in the planning area and directs recreation visitors onto fewer miles of trail that are specifically located to reduce environmental risks.
- It is anticipated that concentrating the trail visitors on fewer trails with a ¼ mile buffer from the boundary should significantly reduce the impact of noise to the neighboring community.
- Through the proper maintenance of the trails by volunteer groups it is anticipated that less environmental impacts will occur and those that do occur will be quickly mitigated once identified.
- Shifting the site to a day use only designation will reduce the impacts caused by nighttime activities, reduce the impacts of nighttime traffic and significantly reduce the number of hours of noise generated by the trail visitors.
- Trails do not currently exist in the steep unstable slope areas of the planning site and to avoid the potential for environmental impacts no new trails were proposed for that area.
- The parking facility will be sited in a location with the least potential for adverse impacts to the environment. The parking and trail facilities will be designed and constructed to reduce any major impacts to the surrounding area. Proper erosion control methods will be used during construction.
- All trails that currently impact wetlands are slated for closure and abandonment. Many of the trails that have had significant impacts to wetlands have already been closed. Restoration activities have already been initiated and will be continued.
- Elk currently utilize a portion of the planning area as travel corridors. The trail system is designed to maintain a riparian-based travel corridor for elk to and from the calving areas.
- The DNR staff has worked with the WDFW and the Sequim Elk Habitat Committee to recognize possible Elk migratory routes and designated elk forage areas that are not intersected by a significant network of trails
- Where trails are located within elk travel corridors, educational signs will be posted notifying recreation visitors of their presence.
- Any new trails will be designed and installed using DNR standards. The DNR staff will work with the trail volunteers to ensure that the drainage structures are installed and maintained properly.

c. Unavoidable Impacts.

- Removal of vegetation and erosion control structures will be addressed on a site-by-site basis.

d. It is anticipated that the potential impacts would not be significant enough to affect the project objectives.

PART III – IMPLEMENTATION CONSIDERATIONS

10) Consistency of the proposal with other plans, policies and laws.

- a) Internal consistency - If there are internal inconsistencies between this proposal and your agency's previously adopted or ongoing plans and regulations, identify any strategies or ideas for resolving these inconsistencies. **NO**

External consistency - If there are external inconsistencies between this proposal and adopted or ongoing plans and regulations of adjacent jurisdictions and/or other agencies, identify any strategies or ideas for resolving these inconsistencies. **NO**

11) Monitoring and Follow-up

- a) Describe any monitoring that will occur to ensure the impacts were as predicted and that mitigation is effective, including responsible party, timing, and method(s) to be used.

The trail wardens and DNR recreation staff will routinely spot-check the site to ensure that the plan is being appropriately implemented. These staff and volunteers, will monitor that results are as predicted (i.e., see if improvements are occurring and to watch for unintended impacts).

- b) Identify any plans or strategies for updating this proposed action based on deviation from impact projections or other criteria. **In the event that additional unanticipated impacts are identified, the DNR recreation staff in conjunction with the proposed Burnt Hill Stewardship Group will develop and implement mitigation strategies. Education of volunteers with trail maintenance standards.**

Attachment 1: FOCUS GROUP Representation:

Backcountry Horsemen of Washington, Olympic Peninsula Chapter (horseback riding)
Olympic Peninsula Motorcycle Club (motorized)
Peninsula Trails Coalition (hikers)
Olympic Peninsula Bicyclists (mountain bikers)
Just Jeep Junkies (4x4s)
Clallam County (county recreation)
Dungeness Elk Management Team (elk habitat)
Citizens-at-Large (neighborhood concerns)
Citizens-at-Large (hikers)
Citizens-at-Large (motorcycles)
U.S. Forest Service (elk habitat and links to trail use on federal lands)
Washington Department of Fish and Wildlife (wildlife)
Clallam County Noxious Weed Board (non-native invasive weeds)
City of Sequim (recreation opportunities)
Merrill & Ring Timber Company (impacts on their neighboring lands)
Olympic Trailblazers (4-wheel drive), Nov 1999 - May 2001.

Attachment 2: FOCUS GROUP Recommendations at 2001 Public Meeting

An Open House was held February 7, 2001, at Carrie Blake Park Center, Sequim, to review a list of recommendations drafted by the Burnt Hill Focus Group for DNR to consider in the future management of the area.

Peninsula Community College, Clallam County Noxious Weed Board, and Washington Department of Fish and Wildlife provided displays relevant to the Focus Group's work. Each of these groups has provided technical support to the Focus Group.

Preliminary Recommendations to Consider When Developing a Recreation Strategy:

- What we have is valuable to all of us.
- Get rid of the garbage.
- Control noxious weeds.
- Protect the wildlife habitat (still need to work on how and how much), particularly the meadows and wetlands.
- Need to address trail maintenance. There also needs to be a commitment to maintenance by Focus Group members.
- Remediation and maintenance needs to occur in ditches and wetlands.
- Respect private property.
- Manage what we have there now.
- An education component is needed.
- Signs are needed for trails (allowed use, etc.) and general rules and information.
- Agree to address and define a staging area(s), including location and size.

Attachment 3: Preliminary Technical Synthesis Recommendations & Map

Based on all the inventory work and site visits, the Focus Group members also agreed in April 2002 on a basic synthesis product. The “synthesis” map demonstrates the group’s conclusion regarding environmental sensitivities and how these would affect trail use and locations. The group will evaluate these influences further as they develop a proposed trail plan. There are basically five elements shown on this map:

- A ¼-mile noise and visual buffer along the outer boundary of the planning area (that might widen in some areas as noise data is collected);
- Elk travel corridor to and from elk calving areas on the west side of Burnt Hill;
- Potential traffic patterns related to trail and staging area locations that could emerge with use, and how these relate to neighborhoods and county road capacity;
- Protection of the two different wetland areas in the southern part of the planning area;
- River and riparian areas, and unstable slopes (as related to locations for any potential new trails; existing trails were not impinging on these areas);

Attachment 4: Draft “Trail Adoption Criteria”

In 2004, DNR and the Focus Group members agreed to use the following list, at least initially, to screen trails proposed as remaining open in the final strategy, and any new trail segments to be built.

- Focus use within the Burnt Hill block on DNR managed lands (Use buffers as discussed by the BHFG.)
- Main roads to remain open to all recreation visitors. Will require all vehicles to be licensed or current ORV tags. Enforcement needed.
- Restrict ingress/egress through private ownership unless there is a formal, signed agreement. This will include motorized or non-motorize use, and include backyard trails. Work with USFS, M&R, and other parties as needed.
- Protect habitat as required by state forest practices and or DNR’s Habitat Conservation Plan.
- Trails should form logical loops or should interconnect. Not one way in and out trails.
- Signage, Signage, Signage. What uses are allowed where and what is not. Needs to be located entering the area, at parking area and at the start of each trail.
- Only one parking area. Place at an acceptable area “central” in the block. Work with County/landowner to restrict parking at Easterly Road or others as needed.
- Sustainability – Trails should be sustainable through design and maintenance. Review DNR, USFS, IMBA, and other trail design standards.

WAC 197-11-444, Elements of the Environment

Natural Environment

a. Earth

Geology, Soils, Topography, Unique physical features, Erosion/enlargement of land area

b. Air

Air quality, Odor, Climate

c. Water

Surface water movement/quantity/quality, Runoff/absorption, Floods

d. Plants and animals

Habitat for and numbers or diversity of species of plants, fish, or other wildlife, unique species, Fish or wildlife migration routes

e. Energy and natural resources

Amount required/rate of use/efficiency, Source/availability, Nonrenewable resources, Conservation and renewable resources, Scenic resources

Built Environment

a. Environmental health

Noise, Risk of explosion, Releases or potential releases to the environment affecting public health

b. Land and shoreline use

Relationship to existing land use plans and to estimated population, Housing, Light and glare, Aesthetics, Agricultural crops

c. Transportation

Transportation systems, Vehicular traffic, Waterborne, rail, and air traffic, Parking, Movement/circulation of people and goods, Traffic hazards

d. Public services and utilities

Fire, Police, Schools, Parks and other recreational facilities, Maintenance, Communications, Water/storm water, Sewer/solid waste, other governmental services or utilities